

Norquay Technology Inc. USA P. O. Box 468, Chester, PA. 19016-0468 610-874-4330(P) 610-874-3575(F) www.norquaytech.com

April 4, 2014

E-MAIL & EXPRESS MAIL

FedEx No. 7984 4682 6882 Mr. Martin Matlin United States Environmental Protection Agency, Region III Office of Land Enforcement (3LC70) 1650 Arch Street Philadelphia, PA 19103-2029

Subject:

Norquay Technology, Inc. Request to Show Cause

Chester, Pennsylvania, Facility

Dear Mr. Matlin:

Norquay Technology, Inc. (NTI) is pleased to submit this response to your letter dated March 25, 2014. Your letter was received on March 26, 2014, and this response is being submitted in a timely manner.

NTI is requesting to meet with the Agency in its Philadelphia office at a mutually convenient date and time to have the opportunity to confer with the Agency. NTI is appreciative that the Agency has given it the opportunity to provide additional documentation to identify the measures it has taken to address the possible violations.

NTI is a small business entity and has strong corporate commitments to comply with federal, state, and local environmental regulations and we work hard to achieve this goal. In addition, we utilize a third party company, IES Engineers Inc, to support our compliance, training and regulatory compliance issues.

NTI is submitting the following responses to the possible violations of the Resource Conservation and Recovery Act (RCRA) that were identified in Agency's the March 25, 2014 letter to further demonstrate NTI's progress since the July 2013 inspection and show cause as to the reasons an Administrative Compliant should not be issued.

NTI's responses follow the numbering using in the Agency's March 25th letter:

#1: Owning and/or Operating a Hazardous Waste Treatment, Storage or Disposal Facility Without a Permit or Interim Status

It is NTI's intent to operate under the allowable exemptions from the TSD facility, and operate as a Hazardous Waste Generator. To comply with the exemptions as a Hazardous Waste Generator, we submit the following comments to the March 25th letter and EPA observations during the July 30, 2013 Inspection.



- 1. NTI has implemented operational and engineering controls to ensure that all containers which hold hazardous waste are closed during storage. The operational controls developed are designed to eliminate open containers. Walkthroughs are conducted by a member of the Management team. During these walkthroughs, containers that hold hazardous waste are inspected. The inspection includes confirmation that the bung and lids are sealed properly. In addition, where possible, NTI has installed "self-closing" containers for satellite accumulation to keep container in the closed position when not being actively used for adding waste to the container.
- 2. NTI has implemented operational controls to ensure that all containers which hold hazardous waste are in good condition. Any compromised containers are stored in overpack drums or are repackaged into a new suitable container. NTI held its annual refresher training on January 30, 2014, and reinforced the procedures to utilize overpack drums or repackaging to store materials when the original packaging has become compromised. Norquay has included a copy of an August 6, 2013 invoice for the purchase of over pack drums in Attachment B to demonstrate that it is prepared to repackage containers if necessary.
- 3. NTI has implemented operational controls to ensure that each hazardous waste container is marked with the accumulation start date. Management team walkthroughs and weekly inspections have also served to inspect the labels of the drums to confirm that containers in the hazardous waste area are properly labeled and visible, with the correct date. NTI has included in Attachment C an internal Quality Alert Report (QAR) to demonstrate that it has procedures in place to identify and correct observations discovered during the walkthroughs. The QAR also demonstrates that NTI is working towards implementing the ISO9001 program. NTI held its annual refresher training on January 30, 2014, and reinforced the requirements for drum labeling.
 - a. The two 55-gallon drums of distilled solvent material in the Production Room were disposed of under manifest number 006831741FLE on August 12, 2013. NTI believes that the waste was generated approximately on June 15, 2013. All referenced manifests throughout this document are included in Attachment D.
 - b. The two 55-gallon drums of mixed solvent waste in the Utility Room were disposed of under manifest number 006831741FLE on August 12, 2013. NTI believes the waste was generated approximately on July 15, 2013.
 - c. The 16 drums of hazardous mixed solvent waste comprised of flammable liquids were disposed of under manifest number 006831741FLE on August 12, 2013. NTI believes the waste was generated approximately on June 15, 2013.



- d. Several drums of organic solvent filtrates and organic solvents in the Final Warehouse were disposed of under manifest number 006831741FLE on August 12, 2013. NTI believes the waste was generated approximately on June 15, 2013.
- 4. NTI has implemented operational controls to ensure that all containers are labeled with the words "Hazardous Waste." Management team walkthroughs and weekly inspections have also served to inspect the labels of the drums to confirm that containers in the hazardous waste area are properly labeled and visible, with the correct date. NTI held its annual refresher training on January 30, 2014, and reinforced the requirements for drum labeling.
 - a. The two 55-gallon drums of distilled solvent material in the Production Room were labeled as "Hazardous Waste" and were disposed of under manifest number 006831741FLE on August 12, 2013.
 - b. The 7 drums of mixed solvent waste comprised of flammable liquids in the Final Warehouse were labeled as "Hazardous Waste" and disposed of under manifest number 006831741FLE on August 12, 2013.
 - c. Several drums of organic solvent filtrates and organic solvents in the Final Warehouse were labeled as "Hazardous Waste" and disposed of under manifest number 006831741FLE on August 12, 2013.
- 5. Under 40 CFR Part 262.34(c), NTI is permitted to accumulate as much as 55 gallons at or near any point of generation. When full, the satellite containers are transferred to the facility's storage area. NTI believes it is in compliance with the regulations for satellite accumulation.
 - a. The container outside of the door of R&D lab serves as a satellite accumulation area for the Production room, R&D Lab, and QC Lab. This container is inspected during the weekly hazardous waste inspection. NTI has included an example of its inspection log in Attachment E to demonstrate that it is inspecting this container. The 5-gallon container stored inside the R&D lab serves as a satellite accumulation area for the R&D Lab.
 - b. The HPLC bottles in the QC Lab are stored near the HPLC machines, which are the point of generation.
- 6. NTI has implemented operational controls to ensure that all containers holding hazardous waste are closed during storage. In addition, where possible new disposal containers were purchased with self-closing lids to have engineering controls support operational controls to ensure all hazardous waste containers are closed during storage.



- a. After the July 2013 inspection, engineering controls were evaluated to ensure the storage container would be in a closed position during storage. A self-closing waste container is in place. The drum containing the used gloves and other clean-up material in the doorway of the Production Area was disposed of under manifest number 006798288FLE on September 27, 2013.
- b. After the July 2013 inspection, all aerosol cans are stored in a dedicated aerosol waste container for proper storage and disposal. The aerosol can with quick drying spray adhesive was disposed of under manifest number 006798288FLE on September 27, 2013.
- c. A self-closing funnel and storage container for hazardous waste codes (D001/F003/F005) was determined to replace the 4 liter container in the QC lab.
- 7. After the July 2013 inspection, a designated hazardous waste container for aerosol cans was established. With regard to the cited item, NTI disposed of the aerosol can containing quick drying spray adhesive under manifest number 006798288FLE on September 27, 2013. Attachment F contains a memo that NTI issued to all plant personnel on August 2, 2013 as a part of further employee training detailing the proper disposal of aerosol cans containing hazardous materials.
- 8. NTI provided annual refresher training on January 30, 2014. All new employees who are expected to handle hazardous materials received receive their initial training within 90 days of their hire date. NTI has included revised training records list in Attachment G.

As a review to address the EPA specific comment from the July 30, 2013 inspection, we look to correct past errors and to move forward and be in compliance with associated training and documentation.

As a review of items cited in the July 30 2013 inspection:

- a. Robert Heldt in his position of President at NTI does not include handling hazardous waste; therefore, he was not required to receive initial training during the period October 1, 2012, to at least December 3, 2013.
- b. NTI has implemented administrative controls to ensure that all employees receive their annual refresher training. Thomas John and Dwayne Jones received their RCRA annual refresher training on January 30, 2014.



- c. NTI has implemented administrative controls to ensure that all employees receive their annual refresher training. Thomas John, Michael Santangelo, and Paul Hinkle received their RCRA annual refresher training on January 30, 2014.
- d. NTI has implemented administrative controls to ensure that all employees receive their annual refresher training. Thomas John, Peter Litak, and Paul Hinkle received their annual refresher training on January 30, 2014.
- 9. NTI completed base line Job descriptions incorporating duties required to be in compliance with hazardous waste regulations. In addition, NTI is currently working towards implementing ISO 9001. As part of this international standard, NTI must maintain control of records, training, and personnel descriptions to meet its certification. NTI's goal is to seek certification in 2014.
 - a. As part of NTI's ISO certification process, it will complete full job titles and written job descriptions for each position related to hazardous waste management.
 - b. As part of NTI's ISO certification process, it will maintain the name of each employee assigned to each job required to receive training.
 - c. As part of NTI's ISO certification process, the company will maintain a written description of the type and amount of both introductory and continuing training that will be given to each person assigned to a position related to hazardous waste management.
 - d. As part of NTI's ISO certification process, the company will maintain documentation of all employees' attendance at refresher training (including Markese Clay) going forward. (See Attachment F-Training Matrix)
- 10. NTI developed its Contingency Plan with guidance from IES Engineers, Inc. to ensure that the documents adhered to all the required regulations. The emergency coordinator's address is given as the business address along with the home and mobile telephone numbers so that they can be reached in an emergency. NTI has not provided the home addresses of the emergency coordinators as the interpretation we were operating under was the "address" required was the business address to satisfy this requirement. (In addition, there is concern with publishing employee home address information in a public document).

In summary, it is NTI's desire to operate under the TSD exemption as a hazardous waste generator, as we have tried to resolve any issues in a timely basis and communicated the resolution of the issues to the EPA.



#2: Failure to Make Waste Determinations

- NTI received customer approval to dispose of the customer's material, which were the contents of the acid room cart on November 15, 2013. (Attachment D – Clean Harbor Manifest 007466164FLE & 007466165FLE).
- 2. NTI made hazardous waste determinations based on process knowledge on these chemicals on July 31, 2013, and disposed of under manifest number 006831741FLE on August 12, 2013. NTI has held its annual refresher training on January 30, 2014. During this training, NTI reinforced the requirements to maintain hazardous waste determinations for all waste on site.

#3: Failure to Keep Containers Closed

NTI has evaluated the containers used for storage and implemented operational and engineering controls to ensure that all containers used for storage meet the following:

- i. Dedicated container for aerosol cans that will meet EPA guidelines.
- Drum over packs for containers in the Final Warehouse that are damaged or defective
- iii. Self-closing funnels for the methanol/water hazardous waste in the QC lab

#4: Failure to Maintain an Adequate Contingency Plan

NTI developed its Contingency Plan with guidance from IES Engineers, Inc to ensure that the documents adhered to all the required regulations. The emergency coordinators address is given as the business address along with the home and mobile telephone numbers so that they can be reached in an emergency. NTI has not provided the home addresses of the emergency coordinators as the interpretation we were operating under was the site address was the business address to satisfy this requirement. (In addition, there is concern with publishing employee home address information in a public document).

#5: Failure to Maintain Hazardous Waste Training Records

NTI is currently working towards implementing ISO 9001. As part of this international standard, NTI must maintain control of records, training, and personnel descriptions to meet its certification. NTI's goal is to seek certification in 2014. NTI completed a training matrix as part of the first step to address specific employee training requirements to meet RCRA training requirements (See Attachment G).

#6: Failure to Provide Hazardous Waste Training

 Robert Heldt was initially trained in hazardous waste handling. His current position at NTI as President does not include handling of hazardous waste and therefore he was not



required to obtain refresher training since he does not make determinations of hazardous waste materials or sign off on hazardous waste regulated documents.

ii. NTI personnel that handle hazardous materials or hazardous materials documents attended the annual refresher training held on January 30, 2014. NTI has implemented administrative controls to ensure that all employees who should receive the Hazardous Waste Training annual refresher training do so by the required due date. It is NTI's goal to be in compliance with the personnel training requirements under the RCRA Hazardous waste regulations and to meet or exceed the training requirements for 25 Pa Code Section 264 a.1

#7: Failure to Maintain LDR Forms

During the July 30 2013 inspection, the LDR form was not able to be located. After the inspection, the form was located and sent to the EPA in support of the December 11 2013 documentation to the EPA. A copy is included in Attachment H.

As we move forward, NTI will prevent future LDR form non-compliance by making this form a controlled document under the ISO 9001 standard, Control of Records Process. An internal audit required by the ISO 9001 process will help ensure that these forms are being properly controlled. LDR forms were submitted to the Agency on December 11, 2013 for the spent non-halogenated solvents referenced in your March 25th letter. The LDR forms are presented in Attachment H. NTI has included other LDR forms in Attachment I to demonstrate that it is keeping the required LDR forms on file.

#8: Failure to Maintain Manifest Form from Receiving Facility of File Exception Form

Manifest Nos.: 005239573, 005239572, 008533486, 005239346, 008543429, 008543531, 005239130, 004835048, 005239284, 005239281, 005239345, 005239344 were not able to be located during the July 30 2013 inspection. After the July 2013 inspection, NTI contacted the disposal sites and received the appropriate documentation. Copies of the manifests are included in Attachment D. NTI forwarded copies of the manifest to EPA on August 9, 2013.

As we moved forward to prevent a re-occurrence of the lack of timely response from the disposal sites for the manifests, NTI determined that the generator and designated facility copies were required to go to either the Production Manager or Office Manager who were required to track the manifests. There was confusion over the responsibility to track the documents within the prescribed 35 days. This procedure was amended.

Now, a computer "calendar event" is created between the Production Manager, Office Manager, and Project Engineer with the shipment of hazardous waste. The individual signing the



hazardous waste manifest creates the event notifying the others of the vendor, manifest number, and due date of the fully signed manifest. When the signed manifest is received by one of these three personnel, the recipient sends an e-mail communicating this to the others and properly files it with the original generator manifest. If the manifest is not received by the 28th day, then the vendor is contacted for the documentation to be in compliance with receiving the documentation by the 35th day after the shipment.

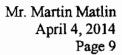
#9: Failure to Store Universal Waste Lamps in Closed Containers

NTI has implemented administrative and operational controls to ensure that all waste lamps are put into an appropriate waste container and sealed when not in use. This box is labeled as "Universal Waste – Lamps" with the accumulation start date. When the box is full it shall be shipped out within 30 days. In any case if the one year accumulation date approaches, it is shipped out prior to the full 12 month accumulation period is reached.

#10: Failure to Label Containers of Universal Waste Lamps

NTI has implemented administrative and operational controls to ensure that all waste lamps are put into an appropriate waste container. This box is labeled as "Universal Waste – Lamps" with the accumulation start date. When the box is full it will be shipped out within 30 days. In any case if the one year accumulation date approaches, it is shipped out prior to the full 12 month accumulation period is reached

In review of the March 25, 2014 EPA letter, NTI believes that that the information provided herein demonstrates that it has either corrected the outstanding compliance issues or has implemented programs to prevent future non-compliance. As a small company, we strive to be in compliance with all applicable federal, state and local regulations. It is our commitment to be a good corporate citizen, and to responds to regulatory issues in a timely basis and to correct problems as they are identified. Attachment A contains the signed certification statement by Robert W. Heldt, President of Norquay Technology, Inc.





We look forward to your proposed meeting date and time. It is our goal to resolve this matter promptly. Should you have any questions, please feel free to contact me or Mr. James Hogate at (610) 874-4330.

Very truly yours,

Robert W. Heldt

President

Norquay Technology, Inc.

Attachment

cc: J. Heenehan, EPA Region III

J. Hogate, Norquay

R. Haas, IES

M. Tucci, IES

A. Soni, IES



ATTACHMENT A CERTIFCATION STATEMENT



CERTIFCATION STATEMENT

"I certify under penalty of the law that I have personally examined and am familiar with the information submitted in this response to Information Request and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining or compiling the information, I believe that the submitted information is true, accurate, and complete. I recognize that there are significant penalties for submitting false and/or misleading information, including the possibility of fine and/or imprisonments."

Signature: Valoutu

Printed Name: Robert W. Heldt

Title: President

ate: Anni



ATTACHMENT B COPY OF OVERPACK DRUM INVOICE



Invoice

609-689-3000 609-259-3575 (fax) nj.sales@mcmaster.com

Billed to

NORQUAY TECHNOLOGY INC P O BOX 468 CHESTER PA 19016-0468 Purchase Order 0805JHOGATE
Total \$164.90
Invoice 56875132

Invoice Date 8/6/13

Payment Terms 2% 10, Net 30

Deduct \$3.30 on merchandise if paid by 8/16/13.

Shipped to

Norquay Technology Inc 800 W Front St Chester PA 19013 Mail Payment to

McMaster-Carr

PO Box 7690

Chicago IL 60680-7690

Your Account

75716200

James Hogate placed this order.

Line		Product	Ordered	Shipped	Balance	Price	Total
5	4482T29	Steel Salvage/Overpack Drum, 20 Gallon Capacity, Nut and Bolt Ring, 18 Gauge	2 Each	2	0	82.45 Each	164.90
				Merchano	lise		164.90
				Total			\$164.90

Packing List	Shipped	Weight	Carrier	Tracking
6264052-01	8/6/13	35 lb	UPS Ground	1Z0835200363751281
	8/6/13	34 lb	UPS Ground	1Z0835200363757383



$\label{eq:attachment} \mbox{ATTACHMENT C}$ QUALITY ALERT REPORT MEMO

QUALITY ALERT REPORT

Date: 3 1 22 1 19
To: Production - Eric Loyan, Sean Pinkett
From: Engineering - Lemes the goto
Description of Issue(s) / Problem(s) / Condition(s):
Description of Issue(s) / Problem(s) / Condition(s): Empty total were found in the hazardous area
Chronology of Event:
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- Hazardous Weste and is for storage of hazardous contamers or
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Contributing Factors .
Operational Error
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Date CAPA or CAPA's Issued://
CAPA Number:
SAFA NUMBER.



Norquay Technology Inc. USA P. O. Box 468, Chester, PA. 19016-0468 610-874-4330(P) 610-874-3575(F)

www.norquaytech.com

Email: jhogate@norquaytech.com

TO:

Production Manager, Warehouse Operator

DATE:

March 22, 2014

SUBJECT:

Incorrect Storage of the Hazardous Waste Area

Eric and Sean,

This memo is to serve as a follow-up to our conversation earlier and issuance of the Quality Alert Report.

On March 22, 2014 several empty totes were found in the Hazardous Waste area in the flammable warehouse. These totes were put there as they were staged for removal by a container vendor, Patrick Kelly Drums.

These totes are to be moved out of the hazardous waste area as soon as possible. As a reminder, only containers that contain hazardous waste are to be in the hazardous waste area. Since these totes do not contain any hazardous material they must be moved as soon as possible.

Secondly, these containers obstructed the view of several labels of drums stored in the hazardous waste area. JR was not able to confirm if there were labels on the drum due to the obstruction caused by the totes.

Regards,

Jim Hogate

Engineering



ATTACHMENT D HAZARDOUS WASTE MANIFESTS

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Claus Hardware Financial Resolutions and Additional Information B. Designated Facility Name and Site Address Surfectly Halass Systems. Inc. 3 700 LaGrange Road. R Y ID 0 5 3 3 4 6 1 0 8 Facility's Prone: 9a. 9b. U.S. DPA ID Number R Y ID 0 5 3 3 4 6 1 0 8 Facility's Prone: 160 2) 845-2453 9a. 9b. U.S. Description (including) Proper Shipping Name, Hazard Class, ID Number, No. Type Claimty No. Type Claimty IA System Handling Instructions and Additional Information Additional Information 14. System Handling Instructions and Additional Information Additional Information 15. CH 1091 3 3 EH-0 \$1.10 15. GENERATOR'SIOFFEROR'S CERTIFICATION: Intereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, manded and labele-placarded, and are a all respects in contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, manded and labele-placarded, and are a all respects in contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, manded and labele-placarded, and are a all respects in contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, manded and labele-placarded, and are a large pack to contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, manded and labele-placarded, and are a large pack to contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, manded and labele-placarded, and are a large packaged to the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, manded and the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified,
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↑ 18. Discrepancy
18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection
Manifest Reference Number: ☐ 18h Attemate Facility (or Generator) U.S. EPA ID Number
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Yea
Bic. Signature of Artemate Facality (or Generator)
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Land Disposal Restriction Notification Form

Page: 1 of 1

Printed Date :Aug 09, 2013

MANIFEST INFO	RMATION			***********		######################################
Generator	: Norquay Tech	nnology Inc			Manifest Tracking	info.
Address	3: 800 West Fro Chester,PA 1				006831741FLE	
EPA ID#		63889	~~~~	Sale	es Order No: 73758967	73
LINE ITEM INFO	************	175-21- N			17666	
Line Item:	Page No:	Profile No:	Treatability Group	i	LDR Disposal Category	
1.	1	CH209133	NON-WASTEWA	TER	2 (This is subject to LDI	R.)
EPA Waste Cod	e			EPA Wa	ste SubCategory	
D001				High TOC	Ignitable Liquids	
F003				i mixtures o		
F005				i mixtures c	isulfide, Cyclohexanone, an only	id/or methanol
			LDR Chemical D	ata		
_				Underlying Hazardous	Constituents of	Contaminants Subject to
Jhemical			(Constituents	Concern	Treatment
ACETONE				Υ	Υ	N
METHANOL				Υ	Υ	N
TOLUENE			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	ΥΥ	Y	<u>N</u>
		<u>Certi</u>	fication			Applies to Manifest Line Items
Pursuant to 40 C Part 268.	FR 268.7(a), I he	ereby notify that this	s shipment contair	s waste res	tricted under 40 CFR	1.
Waste analysis of Signature :	data, where availa		Print Nar	ne <u></u>	5-Pinheft 8/12/13	
Title :	SHIL		Date :		8112113	

TICK) TILLA # 1426 /6228

738023562 SC PPW 8/6/2013 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 UNIFORM HAZARDOUS 1. Generator ID Number 2. Page 1 of 3. Emergency Response Phone 006798288 (800) 483-3718 PAD982363889 WASTE MANIFEST Generator's Name and Mailing Address Generator's Site Address (if different than mailing address) Norquey Technology Inc PO Box 468 800 West Front Street Chester, PA 19013 Chester,PA 19013 Generator's Phone: 6. Transporter 1 Company Name ILS FPAID Number Clean Harbors Environmental Services Inc MAD039322260 U.S. EPA ID Number 7. Transporter 2 Company Name SJ Transportation Company INC NT 3071629776 8. Designated Facility Name and Site Address Clean Harbors El Dorado LLC ARD089748192 **309 American Circle** El Dorado, AR 71790 's Phone: (870)863-7173 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 11. Total 12. Unit 13. Waste Codes and Packing Group (if any)) нм Quantity Wt./Vol. NASO77, HAZARDOUS WASTE, SOLID, N.O.S., (TOLUENE, F003 F005 GENERATOR 1,200 ACETONE), 9, PG III 14. Special Handling Instructions and Additional Information 1.CH419477 4 X S S ERG#171 NJOED # 07259 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeted/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPAAcknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true Generator's/Offeror's Printed Typed Name 16. International Shipments Export from U.S. Port of entry/exit Date leaving U.S. Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name 30 1/3 18. Discrepancy 18a. Discrepancy Indication Space Residue Partial Rejection ___ Full Rejection Manifest Reference Number: U.S. EPA ID Number --18b. Alternate Facility (or Generator) Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Day 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) **H040** 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a ted/Typed Name EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR

Clean Harbors has the appropriate permits for ead will accept the waste the generator is shipping

Please p	print or type. (Form designed for use on elite (12-pitch) typewriter.) 21. Generator ID Number 7110 1823638954	22. Page	23. Man	ifest Tracking Nu	Form A	pproved. OMB No.	2050-00
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26.	Transporter Clean Harbors E	nvironmental Services inc			U.S. EPA 1D	Number 3932225	0	
27a HM		oping Name, Hazard Class, ID Number,	28. Conta No.	iners Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
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		nsporter 2 Company Nam		3017000110					U.S. EPA ID		3222	00	
	9 00	signated Facility Name an	d Site Address						U.S. EPA ID	Number			
	30 FI	van Harbors El D 19 American Cin Donald, AR 713	Dorado ELC sie	173							7481	9 2	
	9a. HM	9b. U.S. DOT Description and Packing Group (if a		Shipping Name, Hazard Cl	ass, ID Number,		10. Con	tainers Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Co	tes
GENERATOR —	\vdash	ļ	ARDOUS W	aste, solid, n (S , (TOLUEN	Ē,	(, 4)	1	1,760	1	F003	r005	
- GENE		2.											
		3.		, , , , , , , , , , , , , , , , , , ,									
	-	4.											
		pecial Handling Instruction								*			
	L								" (*) .€ . (*) ————————————————————————————————————				
		marked and labeled/placar Exporter, I certify that the o	rded, and are in all re contents of this consi	N: I hereby declare that the espects in proper condition ignment conform to the tem identified in 40 CFR 262.27	for transport according as of the attached EPA	to applic	cable international and no ledgment of Consent.	ational governo	nental regulations	ipping name . If export sh	ipment and I	am the Pri	rary
		rator's/Offeror's Printed/Ty	ped Name		-	Sig	nature A	· Ja	 حت		Mo {~	nth Da	Year
INT	16. In	ternational Shipments	te only)	o U.S.	Exp	ort from l		entry/exit:					
	17. Tr	ansporter Acknowledgment porter 1 Printed/Typed Nar	t of Receipt of Materi	ials		Sign	nature /	7 17	7		Mor	nth Da	y Year
TR ANSPORTER		X	16 -6	f SUS			nature	M	<u></u>		Mo	112	7 1 3 y Year
THE STATE OF	18. Di	iscrepancy				Ĺ_					·		
	18a. I	Discrepancy Indication Spa	uce Quant	ity	Туре		Residue Manifest Referer	nce Number:	Partial Re	jection		Fuli Re	ection
¥ E E	18b. /	Alternate Facility (or Gener	rator)						U.S. EPA ID	Number			
GNATED FACILITY	Facilit 18c. S	ty's Phone: Signature of Alternate Facil	ity (or Generator)								M	onth D	ay Year
NS S	19. Ha	azardous Waste Report Ma	anagement Method	Codes (i.e., codes for haza	rdous waste treatment	, disposa	l, and recycling systems)					
1	1. H	1040		2.		3.			4.				
	ı		or Operator: Certifica	tion of receipt of hazardous	materials covered by			tem 18a					
		d/Typed Name					nature					onth De	y Year
EPA	Form	8700-22 (Rev. 3-05) F	revious editions	are obsolete.						G	ENERATO	OR'S INI	TIAL COPY



Land Disposal Restriction Notification Form

Page: 1 of 1

Printed Date :Sep 25, 2013

MANIFEST INFO	RMATION	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
Generator	: Norquay Ted	chnology Inc			Manifest Tracking	g Info.
Address	800 West Fr Chester,PA				006798288FLE	
EPA ID#		363889		Sal	es Order No: 738023	562
LINE ITEM INFO	Page No:	Profile No:	Treatability Group		LDR Disposal Catego	
· · · · · · · · · · · · · · · · · · ·		i	i .		i	•
1.	1	CH419477	NON-WASTEWA	TER	2 (This is subject to L	DR.)
EPA Waste Cod	е			EPA Wa	ste SubCategory	
F003 F005				i mixtures o	sulfide, Cyclohexanone,	
			LDR Chemical D	ata		
- Chemical			(Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
CETONE			· a	Ϋ́	Y	N
METHANOL				Υ	Y	N
TOLUENE				Y	Υ	N
		Ce	rtification			Applies to Manifest Line Items
Pursuant to 40 C Part 268.	FR 268.7(a), I h	nereby notify that t	this shipment contain	s waste res	tricted under 40 CFR	1.
Waste analysis of Signature:	data, where ava	lable, is attached	Print Nar		Ansell	-
Signature :	SIN		Date:	-1.	127/13	
IUC .						·

UNIFORM HAZARDOUS 1. Generator D Number WARTE MANIFEST PAD 9 8 2 3 6 3 8 8 9 5. Generator's Name and Mailing Address Notiquely Technology Inc PO Box 468 Chester, PA 19013 Generator's Phone: 6. Transporter 1 Company Name Clean Herbors Environmental Services Inc 7. Transporter 2 Company Name Clean Herbors El Dorado LLC 30 American Circle El Dorado, AR 71730 Facility's Phone: 9a. 9a. 10. UN 5. OTO Secrition (reduding Proper Shipping Name, Hazard Class, ID Number and Packing Group (ff any)) 1. UN1289, WASTE FLAMICABLE LIQUIDS, CORROS (PROPIONYL CHLORIDE, ACETYL CHLORIDE), 3, (i) 1. UN2885, WASTE CHLOROSILANES, FLAMIMABLE N.O.S., (CHLOROTRIMETHYLSILANE, DICHLORODIMETHYLSILANE), 3, (8), PG II 4. RQ, UN1992, WASTE FLAMIMABLE LIQUIDS, TOX (ACETONE, DICHLOROSIHANE), 3, (6.1), PG II (DO 14. Special Handling Instructions and Additional Information 1. LRCTD 2. LRCTD 2. LRCTD 3. LRCTD 3. LRCTD 4. CH433592 15. GENERATOR'S/OFFEROR'S CERTIFICATION: 1 hereby declare that the contents of the contents o	41488-001	SC PPW	8/8/20		For	m Approved.	CK OMB No. :	2050-0
Notiquery Technology Inc PO Box 468 Chester, PA 19013 Generator's Phone E. Transporter I Company Name Clean Herbore Environmental Services Inc 7. Transporter 2 Company Name Clean Herbore Environmental Services B. Designated Facility Name and Site Address Clean Herbore El Dorsdo LLC 309 American Circle El Dorsdo, AR 71.730 Facility's Phone: 9a. Bp. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any)) 1 UN1289, WASTE SODIUM METHYLATE SOLUTION X (PROPIONYL CHLORIDE) ACETYL CHLORIDE), 3, (if any) 1 UN1289, WASTE CHLOROSILANES, FLAMMABLE LIQUIDS, CORROS (PROPIONYL CHLORIDE) ACETYL CHLORIDE), 3, (if any) 1 UN1289, WASTE FLAMMABLE LIQUIDS, CORROS (PROPIONYL CHLORIDE) ACETYL CHLORIDE), 3, (if any) 1 UN1289, WASTE FLAMMABLE LIQUIDS, TOX (ACETONE DICHLORODIMETHYLSILANE, DICHLORODIMETHYLSILANE, DICHLORODIMETHYLSILANE, 3, (if any), 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	2. Page 1 of 3. Em	ergency Response OO) 483-37 ators Site Address	71\$		0746	3616	4 F	LE
8. Transporter 1 Company Name Clean Herbors Environmental Services Inc 7. Transporter 2 Company Name Clean Herbors El Dorado LLC 30 American Circle El Dorado, AR 71730 Fadility Phone: 9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Numb and Packing Group (if any)) IN1289, WASTE FLAMMABLE LIQUIDS, CORROS (PROPIONYL CHLORIDE) ACETYL CHLORIDE), 3, (if 1. UN1289, WASTE FLAMMABLE LIQUIDS, CORROS (PROPIONYL CHLORIDE) ACETYL CHLORIDE), 3, (if 1. UN1289, WASTE FLAMMABLE LIQUIDS, TOX (ACETONE, DICHLOROFTHANE), 3, (if), PG II 1. LRCTD 2. LRCTD 3. LRCTD 4. CH433592 15. GENERATOR SOFFEROR'S CERTIFICATION in the leyer soft the atter Certify that the waste minimization statement identified in 40 CFR 262.27(e) (if I am a Generator's Offeror's Printed Typed Name 16. hternational Shipments 17. Transporter 2 Printed Typed Name 18. Discrepancy Indication Space 18. Discrepancy Indication Space 19. Lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste	80	West From	nt Street					
8. Designated Facility Name and Site Address Clean Harborn El Dorado LLC 300 Armerican Circle El Dorado, AR 71730 Facility's Prione: 9a. US. DOT Description (including Proper Shipping Name, Hazard Class, ID Numbrand Packing Group (if any)) 1 UN1288, WASTE SODIUM METHYLATE SOLUTION X 2 UN2924, WASTE FLAMMABLE LIQUIDS, CORROS (PROPHONYL CHLORIDE, ACETYL CHLORIDE), 3, (if and Packing Group (if any)) 1 UN1988, WASTE CHLOROSILANES, FLAMMABLE N.O.S., (CHLOROTRIMETHYLSILANE, DICHLORODIMETHYLSILANE, DICHLORODIMETHYLSILANE, 3, (if any) 14. Special Handling instructions and Additional information 1 LRCTD ERG#132 1X5 2 LRCTD ERG#132 1X5 3 LRCTD ERG#132 1X5 3 LRCTD ERG#131 8X55 15. GENERATOR'SIOFFEROR'S CERTIFICATION: 1 hereby declare that the contents of marked and labeled/placarded, and are in all respects in proper condition for transport Exporter, 1 certify that the contents of this consignment conform to the terms of the attition in the waste minimization statement identified in 40 CFR 282.27(a) (if I am a Generator's/Olferor's Printed/Typed Name 16. International Shipments Impoint to U.S. 17. transporter Acknowledgment of Receipt of Materials 18. Discrepancy 18a. Discrepancy 18b. Discrepancy Indication Space Qeantity 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 19. Hazardous Waste Report Management Method C				MA	ID Number	3222	50	
Clean Harbors El Dorado LLC 306 American Circle El Dorado, AR 71730 Facility's Phone: (870)863-7173 9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any)) 1 UN1289, WASTE SODIUM METHYLATE SOLUTION X 2 UN2924, WASTE FLAMMABLE LIQUIDS, CORROS (PROPIONYL CHLORIDE ACETYL CHLORIDE), 3, (i) 3 UN2985, WASTE CHLOROSILANES, FLAMMABLE N.O.S., (CHLOROTRIMETHYLSILANE, DICHLORODIMETHYLSILANE, DICHLORODIMETHYLSILANE, DICHLORODIMETHYLSILANE, DICHLORODIMETHYLSILANE), 3, (8), PG II 4 RQ, UN1392, WASTE FLAMMABLE LIQUIDS, TOX (ACETONE, DICHLOROTRIMETHYLSILANE), 3, (6.1), PG II (DO 14. Special Handling instructions and Additional Information 1 LIRCTD ERG#132 1X5 31. LIRCTD ERG#132 1X5 31. LIRCTD ERG#131 BX55 15. GENERATOR:SOFTEROR'S CERTIFICATION: I hereby declare that the contents of marked and labeled/placarded, and are not all respects in proper condition for transporter, certify that the contents of this consignment conform to the terms of the attal Lordify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a Generator's/Olferor's Printed/Typed Name 16. International Shipments Import to U.S. Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Malerials Trarsporter 1 Printed/Typed Name 18. Discrepancy Indication Space Quantity Type 18t. Alternate Facility (or Generator) 19t. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 12.	wc.			MA	ID Number	3222	50	
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2 UN2024, WASTE FLAMBIABLE LIQUIDS, CORROS (PROPIONYL CHLORIDE), 3, (i) 3 UN2068, WASTE CHLOROSILANES, FLAMMABLE N.O.S., (CHLOROTIRMETHYLSILANE, DICHLORODIMETHYLSILANE, DICHLORODIMETHYLSILANE), 3, (8), PG II 4 RQ, UN1992, WASTE FLAMMABLE LIQUIDS, TOX (AGETONE, DICHLOROETHANE), 3, (6.1), PG II (DO 14. Special Handling Instructions and Additional Information 1 LIRCTD ERG#132 1X5 2 LIRCTD ERG#132 1X5 3 LIRCTD ERG#132 1X5 3 LIRCTD ERG#133 1X5 5 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of marked and labeled/placarded, and are in all respects in proper condition for transport Exporter, I certify that the contents of this consignment conform to the terms of the attained to certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a Generator's/Offeror's Printed/Typed Name 16. International Shipments Impoint to U.S. 17. transporter Acknowledgment of Receipt of Materials 18. Discrepancy Indication Space Quantity Type 18. Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste	er,	10. Conta No.	iners Type	11. Total Quantity	1	1 ! 13.	Waste Code	es
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Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Malerials Transporter 1 Printed/Typed Name James Kilmsor Transporter 2 Printed/Typed Name 18. Discrepancy 18a. Discrepancy Indication Space Quantity Type 18b. Alternate Facility (or Generator) Fadility's Phone: 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste 1.	Signature		4]	onth Da	٠.
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H040 H040	eatment, disposal, and 3.			4.	H040			
20: Designated Facility Owner or Operator: Certification of receipt of hazardous materials of Printed/Typed Name	ered by the manifest ex	ept as noted in Ite	en 18a			M	lonth Da	у G 1 л

Bloan Harbors has the appropriate permits for and will accept the we

SC PPW 8/8/2013 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) **938741438-001** Form Approved, OMB No. 2050-0039 2. Page Manifest Tracking Number UNIFORM HAZARDOUS WASTE MANIFEST 21. Generator ID Number 2 of 3 **d**07486164FLE PAD982363889 (Continuation Sheet) 24. Generator's Name Norquey Technology Inc U.S. EPAID Number mp 039382780 Em 25. Transporter Company Name crachrol U.S. EPAID Numb 034377750 26. Transporter MAID Company Name W 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number 28. Containers 29. Tota 30. Unit 31. Waste Codes Quantity Wt./Vol. and Packing Group (if any)) HМ No 5. UN\$504, WASTE ORGANOMETALLIC SUBSTANCE, LIQUID, PYROPHORIC, WATER REACTIVE, (DIISOBUTYLALUM NUM HYDRIDE, TOLUENE), 4.2, (4.3), PG I D001 D003 F005 001 ÈF 00008 6. UN\$206, WASTE ALKALI METAL ALCOHOLATES, SELF-HEATING, CORROSIVE, N.O.S., (POTASSIUM TERT-BUTOXIDE, SODIUM TERT-BUTOXIDE), 4.2, (8), PG II D001 D003 ÞΕ 00023 R 001 D001 D003 7. UN1876, WASTE METAL CATALYST, WEITED, (RANEY NICKEL), X DF 00004 001 4.2, PG II 8. UN1428, WASTE SODIUM, 4.8, PG | D001 D003 GENERATOR X 001 M 00020 9. UNSS99, WASTE ORGANOMETALLIC SUBSTANCE LIQUID D001 D003 F003 WATER-REACTIVE, FLAMMABLE, (METHYLMAGNESIUM BROMIDE, TETRAHYDROFURAN), 4.3, (8), PG I X 001 ÐF 00070 10. UN\$105, WASTE CREANIC PEROXIDE TYPE D, LIQUID, OMETHYL ETHYL KETONE PEROXIDE <45%) 5.2. PG/II DD01 D003 001 ĎF 00002 ¥ 11. UN\$107, WASTE ORBANIC PEROXIDE TYPE E, LIQUID, D001 D003 X (TERT-BUTYL PEROXIDE 98%), 5.2, PQ II DF 001 00014 12. UN\$109, WASTE ORGANIC PEROXIDE TYPE F, LIQUID, 0001 D002 D003 (PEROXYACETIC ACID 3\$%, STABILIZED), 5.2, PG II 001 DF 00006 13. UN1810, WASTE PHOSPHORUS OXYCHLORIDE 6.1, (8), PG I, TOXIC-INHALATION HAZARD ZONE B, DOT-SP 9168 **P**002 D003 001 CF 00008 P 14. UN1838, WASTE TITANIUM TETRACHLORIDE, 41, (8), PQ I, 0002 D003 TOXICINHALATION HAZARD ZONE B. DOT-SP 9161 001 CF 00008 9. LRCTD 32 Special Handling Instructions and Additional LCTD ERG 135 1X5 13.LECTA ERG# 37 1XPBIF 14.LECTA ERG# 37 1XPBIF ERG#138 LX30 X5 X5 6 LRCTD ERG#136 1X16 10.LRCTO ERG#145 7 LRCTD ERG#170 1X5 8 LA99H ERG#138 1X5 11.LRCTO ERG#145 12.LRCTO ERG#145 **X5** Transporter Acknowledgment of Receipt of Materials Printed/Typed Name Signatu TRANSPOR 34/Transporter_____ Printed/Typed Name Acknowledgment of Receipt of Materials Year Signatu Mont 0 B Discrepancy FACILITY treatment disposal, and recycling systems 36 Saz House Vaste Report Management Mithod Cadassi.e., codes for hazardous waste . H040 . HO40 10. H040 12.H040 13. H040 11. H040 L4. H040 EPA form 8700-22A (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

ase	e pri	nt or type. (Form designed for use or	n elite (12-pitch) typewriter.)	741488-001		PPV 8	/6/2013		n Approved	. OMB No.	2050-0
		ORM HAZARDOUS WASTE MANI			22. Page		ifest Tracking Nu	4			
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		Norqua	y Technology inc					÷			
-						+	U.S. EPA D	Number	-		
Ľ	25. T	ransporter Company Name									
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	7a.	27b. U.S. DOT Description (including Pro	oper Shipping Name, Hazard Class, ID N	umber,	28. Conta		29. Total	30. Unit	31.	, Waste Cod	es
ļ	M	and Packing Group (if any))			No.	Tipe	Quantity	Wt./Nol.	+ +		T
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,	K	16. UN2927, WASTE TO N.O.S., (METHYLENE CHI (8), PG II	XIC LIQUIDS, CORROSIVI ORIDE, TITANIUM TETRA	E, ORBANIC, ACHLORIDE), 6.1,	001	O F	0000	P	D002	D003	F00
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,	K	17. UN1754, WASTE CH BULFUR TRIOXIDE), 8, ((ZONE B. DOT-SP 9168	LOROSULFONIC ACID (M).1), PG I,TOXIC-INHALAT	TON BAZARD	001	₽ F	0000	P		POVS	
	K	18. UN2092, WASTE BO TOXIC-INHALATION HAZ	RION TRIBROMIDE, 8, (6 AND ZONE B, DOT-SP 91	.1), FG 1, 66	001	F	00003	P	D002	D003	
1	K	19. UN2604, WASTE BO 8, (3), PG I	RON TRIFLUORIDE DIET	HYL ETHERATE,	001	F	00008	P	DQ01	D002	DO
	X	20. UN3284, WASTE CO N.O.S., (PHOSPHOROUS	RROSIVE LIQUID, ACIDIC PENTOXIDE, THIONYL CI	: INORGANIC, HLORIDE), 8, PG I	001	ÞF	00032	P	DQ02	D003	
<u> </u>		21. RQ, UN2030, WAST (8.1), PG II (HYRAZINE R	E HYDRAZINE, AQUEOUS IGNOHYDRATE)	SOLUTIONS, 8,	001	ÞF	00012	P	D002	0003	
-	x	22. UN2920, WASTE CO (ACETIC ANHYDRIDE, PI	PROSIVE LIQUIDS, FLAN	MABLE, N.O.S.,	001	DF	00070		D 0 01	D002	DO
┞		Process resistance, re	THE CHECKED	-,, 02(0), 1 4 11		↓ F`-	1000	17-	F003	-	\bot
	X	23. RQ, UN2809, WAST	EMERCURY, 8, (6.1), PG	HI (2009)	001	DF	00001	•	De02	D009	
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Form Approved, OMB No. 2050-0039

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×	18. UN2927, WASTE TORON NO. S. CARRIM HYBROWNS	, qui cherania), 0.1 , (8), P0	001	DF	00035	P	HORE	U497	DQ25
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X			001	DF	00085	P		# 4 x/A	-
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iiF	ORM HAZARDOUS WASTE M. (Continuation Sheet)	ANIFEST 21. Generator ID Nur PADO 8.2		22. Page 3 07 3		lest Tracking Nu G61867]				
Ge	tada Nama	quay Technology Inc		***************************************						
_						U.S. EPA ID	Number		···	
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Ţr	ransporter Company Nam	e				U.S. EPA ID	Number			
	27b ₂ USS DOT Description (including and Packing Group (if any))	g Proper Shipping Name, Hazard C	lass, ID Number,	28, Con	ainers Type	29. Total Quantity	30. Unit Wt./Vol.	31.	Waste Codes	3
	15. UNE847, WASTE	ANILWE, 0:1, PG H		001	DF	00001	P	U012		
	: '					50001				
	16. UNILDES, WITHOU	HILDES (D. H. P.),	0.1.5 PG 11	001	DF	00004	Р			
1	17. UNBELO, TOXOC L 5-TRICHLOROBENZE	LOUINE, SHEAMIC, N. NE. DICHLOROAMILIN	OA (E.A., E). G.I. PG II	001	DF	00160	Р			
+	18. UN1675, PHENY	ENEDIAMMES (O; M	(-; P-;), 6.1, PG III	001	DF	00010	P			
+	19. UNSREZ, AMENO	HIEMOLS (04 M-; P-),	eThen	001	DF	00005	P			
	20. UNITSO, WASTE	HYDROFLUORIC ACI	J, 8, (8.5), PG I	100	CF	00005	P	D002	U134	
1	21. UN1828, SODIUK	HYDROXIDE, SOLID	, 8, PQ II	100	DF	00025	Р	,,,,,		
	22. UN2895, WASTE	HYDROXYLAMINE SU	LFATE, 8, PG III	001	DF	00008	Р	D002		
+	28. NON DOT REGUL	ATED MATERIAL		001	DF	00190	P			
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50 La	an Harbors La 0 Independen Porte, TX 775 Phone:	ce Parlows						TXD	982	2901	.40
	9b. U.S. DOT Descripti and Packing Group (if	on (including Prope		zami Class, ID Numb	per,	10. Conta	iners Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Codes
X	UN3394, W	ASTE ORGA C, WATER I	NOMETALLIC REACTIVE, (HI	SUBSTANCEXANES, BU	E, LIQUID, TYLLITHIUM)		CY	00350	Р	D001	D003
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	24. Generator's Name Wesquay Technol	11194				~	
	25. Transporter Company Name Company Name Company Name	Serve She			U.S. EPA ID	•	22260
\prod	26. Transporter Company Name	ROBBITO WOOD	E(U.S. EMAIL	100 6	7130891
$\ \ $	27a. 27b. U.S. DOT Description (including Proper Si		28. Contai		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
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	32. Special Handling Instructions and Additional Info	rmation .					
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		erator's Name and Mailir	ng Address			Generator's Site Addr		n mailing addres	s)			
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	Gener	lector, PA 1901 alor's Phone:	L3			Chester,PA						
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	58 He Facility	1 Millicon Drive bron, OH 4302	eyeling Servi e SE 5 (740) 929-2	ces of Ohio, LLC				ОНО	980	5879	64	
	9a.	9b. U.S. DOT Descripti	ion (including Proper	Shipping Name, Hazard Cla	asa, ID Number,	10. Co	ntainers	11. Total	12. Unit	13.1	Weste Code	s
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					ns of the attached EPA Acknow (a) (if I am a large quantity ger		small quantity ger	nerator) is true.				
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DESIGNATED FACILITY	19. Ha	zardous Waste Report M	anagement Method	Codes (i.e., codes for hazar	dous waste treatment, dispose	al, and recycling system	s)					
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		esignated Facility Owner of	Operator: Certifica	tion of receipt of hazardous	materials covered by the man	ifest except as noted in	tem 18a			Mor	nth Day	Year
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١		MONGOUS TECHNOLOGY			U.S. EPA ID	Number	
	25.	ransporter 3 Company Name Environ mantal Sol	MIYOS /	nc	M	M03	4322250
1			Vice		U.S. EPA ID	Number	1882-00
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1	27a.	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	28. Contai	iners	29. Total	30. Unit	31. Waste Codes
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Form Approved, OMB No. 2050-0039 734137676 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 4. Manifest Tracking Numbe 1. Generator ID Number 2. Page 1 of UNIFORM HAZARDOUS 00523928 WASTE MANIFEST PAD982363889 800)483-3718 Norquay Technology inc PO Box 468 800 West Front Street Chester, PA 19013 Chester,PA 19013 Generator's Ph 6. Transporter 1 Company Name U.S. EPAID Number Clean Harbors Environmental Services Inc MAD039322250 S EPAID Number Transporter 2 Company Name Harbers Env. Services Inc MADO39322250 lean U.S. EPA ID Number SET Environmental inc TXD055135388 5743 Cheswood Street Houston, TX 77087 acility's Phone: Phone: (713)645 8710
9b U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11. Total 12. Unit 9a 13, Waste Codes and Packing Group (if any); Wt.Nol. Quantity HM No. Type UN1415, WASTE LITHIUM, 4.3, PG I D001 D003 GENERATOR X 2 $\mathcal{P}_{\mathcal{L}}$ outs003h 0000F 2018394 waste Organometallic Substance, liquid, Pyrophoric, water Reactive (butyllithium, BOOK 1000 outs DOIH cyclohexane), 4.2(4.3), PGI 20015 JUN 3399, waste organometallic substance, liquid, water reactive, flammable DOO' DOO3 Cretrahydroforan), 4.3(3), PGI DUTS COIH 00010 14. Special Handling Instructions and Additional Information ERG#138 2×16 1.90573 2.LRCTD 90513 1×05 90513 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby deciare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged. marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable internetional and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. Learlify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name Day Year 5000 17112 16. International Shipments Export from U.S. Port of entry/exit. Transporter signature (for exports only): Date leaving U.S. 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Transporter 2 Printed/Typed Name 18. Discrepancy 18a. Discrepancy Indication Space ____Туре Residue Partial Rejection Full Rejection Manifest Reference Number U.S. EPA ID Number 18b. Alternate Facility (or Generator) FACILITY Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Day Year IGNAT 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) DES 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Day Printed/Typed Name Month Year eman

	orint or type. (Form designed for use on elite	(12-pitch) typewriter.) 21. Generator ID Number	22. Page	23. Manifest Tracking Nu		Approved, OMB No. 2050-0039
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24.	Generator's Name NORQUAY TECHNOLE	OBY, ING				
-				U.S. EPA IO	Number	
25.	Transporter 3 Company Name	ENVIRONMENTAL, INC.		1 500	10/00	121/
1		LAVITESWHIENING, INC.		U.S. EPA ID	61957 Number	~~~ <u>~</u>
26.	Transporter Company Name			1		
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ESET Environmental, Inc. SET Environing

713-645-8710 // 800-598-7328 // Fax: 713-649-1027

TNRCC Permit Number: HW-50267

EPA ID Number: TXD055135388

APPROVAL NUMBER:

90573

				PAGE		. 01
		LAB PACK S	UMMARY			
I. GENERAL INFO	RMATION					
GENERATOR	Norquay Technolo	None -	B	ROKER NAME	Clean Harbors	Environmental Serv.
	Eric Logan	/8/			Bekki Fay	Attended to the
TELEPHONE			•		781.792.5386	<u> </u>
FAX			_		781.792.5938	
MAILING ADDRESS					42 Longwater	
	Chester PA 19013		_ cr	TY, STATE ZIF	Norwell MA 02	061
	800 West Front St Chester PA 19013	reet	-			
UITT, STATEZIF	Chester PA (3013		-			
U.S. EPA ID No.	PAD982363889		Texa	s Generator ID No	D0053]
II. DESCRIPTION	AND QUANT	TY				
TREATMENT	CONTAINER	CONTAINER	TEXAS WASTE	TREAT	MENT ONE	TOTAL # OF
CODE	SIZE	ID NUMBER	CODE*		ONLY	CONTAINERS
13N33LP	5	1	OUTSOOTH	585	40	4
LZNZZLP	5	2	OUTS001H	585	2-0	
43N33LP	5	3	OUTS001H	95	20	
63N33LP	5	4	OUTS001H	95	20	1^
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*See comment details	A IL PTEVAS WIASTE S	ODC# Dave	l	1360		
FORM CODES	O IT TEXAS WASTE	ODE BOX.		 , .	- CLASSIFICATION C	ODES
001 - Lab Packs of old	Chemicals	004 - Lab packs conta	ining acute hazardous wa	riste	020311011011	
002 - Lab Packs of deb	ris only		(Specify in Comments)		H - Hazardous per	r RCRA
003 - Mixed lab packs				1 1	1 - Class 1 (nonha	azardous)
PACKING MEDIUM —						
			m			
✓ Vermiculite L	Clay Based S	awdust Corn (Cob (Siikwik)Oth	er (Please specify	›	
Comments:						
	· · · · · · · · · · · · · · · · · · ·					*************************************
III. CERTIFICATION	ONS					
GENERATOR: i hereby certify th		his summary and attache	d inventories are not radios	ctive nathogenic or	infectious and do not o	contain 2.3.7.8-fetrachloren
-dibenzodioxon (dioxon) or diben						
hazards have been disclosed, i u						unidentified, off-specification
or unapproved containers may re	•	• •		•		
Ez			_	Production	Manager	
SIGNATURE			_	TITLE	-	
SIGNATURE Fric Lo NAME (Printed or Typ	gan			12 - 20-	Manager 2011	_
[
PACKAGING AGENT: I certify the and by DOT packaging exemption						
F-2 /				Production	Mariner	
SIGNATURE		······································		TITLE	n Manager 1011	
Ein Lon	an ad		_	12-20-2	011	
NAME (Printed or Typ	ed)			DATE		

SET Environmental, Inc. 5738 Cheswood Street - Houston, TX 77087

713-645-8710 // 8

GENERATOR: Norquay Technology DOT SHIPPING DESCRIPTION: UM/415, waste, lithium PROFILE NUMBER: PROFILE NUMBER		// 800-598-73						LAB PA	CK INVE	ENTOR	1	•	•	Page	1	of .	1
PRIMARY DOT HAZARD CLASS: 4.3 CONTAINER SIZE: 5 DATE PACKED BY: Norquay Tech DATE PACKED: PACKED BY: Norquay Tech DATE PACKED: PACKED BY: Norquay Tech DATE PACKED: DATE PACKED: DATE PACKED: DATE PACKED BY: Norquay Tech DATE PACKED BY: Norquay Tech DATE PACKED: DATE PACKED BY: Norquay Tech DATE PACKED: DATE PACKED BY: Norquay Tech DATE PACKED BY: Norquay	pot s												PROFI	LE NUMBER:	9	0573	
DOT IDENTIFICATION NUMBER: OT ADDITIONAL DESCRIPTORS: PRIMARY DOT LABLE SUBSIDARY DOT LABLE (IF ANY)	PRIMAR	Y DOT HAZA	ARD CLASS		4.3				CONTAI	NER SIZE	5					v Tech	
PRIMARY DOT LABLE SUBSIDARY DOT LABLE (IF ANY) PACKING MEDIUM Veriniculties Glay Based Sawitust	DOT IDE	NTIFICATIO	N NUMBER	:			PG:						DA	TE PACKED:			
3 4.1 4.2 4.3 3 4.1 4.2 4.3				:					-			, ,,,	0.10 berry				
S.1 S.2 G.1 8 9 S.1 S.2 G.1 8 9 Corn Cob (Silverik) Other (Specify)				Clas		Γ°						1 1		F1a			
DESCRIPTION All Items must be 100% Identified with all components and puncentrations listed. S 1×5.5 lbs 4.3 I D801, D003 R D 249 NWW W C S SUCCESS II D801, D003 R D 249 NWW W SUCCESS III D801, D003 R D 249 NWW W SUCCESS III D801, D003 R D 249 NWW W SUCCESS III D801, D003 R D 249 NWW W SUCCESS III D801, D003 R D 249 NWW W SUCCESS III D801, D003 R D 249 NWW W SUCCESS III D801, D003 R D 249 NWW W SUCCESS						-	_		L., 112		<u></u>					_	
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713-645-8710 // 800-598-7328 // Fnx: 713-649-1027

LAB PACK INVENTORY

Page	2	of	1
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DOT S	GENERATOR: HIPPING DESCRIPTION:	Norquay UN1415, y	Technology waste, lithlur	n					.,	PROFI	ER NUMBER: LE NUMBER: ST NUMBER;		90513	
OOT IDE	Y DOT HAZARO CLASS: INTIFICATION NUMBER:			PG:	I		NER SIZE: IER TYPE:			-	PACKED BY: TE PACKED:	Norqua		
IT ADDI	TIONAL DESCRIPTORS: DOT LABLE	☑ 4.3 ☑ 8			ARY DOT LABLE 3	1 🛚 42	[] 4.3 8	<u>□</u> 9	Ūv	UNG MEDIUM 'ermiculite om Cod (Sükwik)	☐ Clay B		□s	Sawdust
пем	DESCRIPTION All items must be 100% components and conce	ntiations	liéted.	S L or G	©TV	PRIMARY HAZARD CLASS	SUB. HAZARD GLASS	1	LAND DISPOSAL RORA WASTE CODE	CATEGORY	F-SOLVENT	ŴW		1
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SET Environmental, Inc. 5738 Cheswood Street - Houston, TX 77087

8 Cheswoo 3-645-8710	d Street - Ho // 800-598-73	uston, TX 1 28 // Fax: 7	77087 13-649-1027			LA	AB PA	ACK INVE	ENTORY	ŕ			Page		of	
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5738 Cheswood Street - Houston, TX 77087 713-645-8710 // 800-598-7328 // Fax: 713-649-1027

LAB PACK INVENTORY

Page	4	of	4
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GENERATOR: Norquay Technology DOT SHIPPING DESCRIPTION: UN3399, WASTE org: (tetrahydrofuran) PRIMARY DOT HAZARD CLASS: 4.3 (3) DOT IDENTIFICATION NUMBER: DOT ADDITIONAL DESCRIPTORS: PRIMARY DOT LABLE 3 4.1 4.2 4.3 5.1 5.2 6.1 8 9	PG: SUBSIDA	RY DOT LABLE	CONTAIN CONTAIN (IF ANY)	NER SIZE: ER TYPE:	5 DM	PROF MANIF	Clay Ba	Norqua	iawdust
ITEM DESCRIPTION All items must be 100% identified with all components and concentrations listed.	S L or G	QΤΥ	PRIMARY HAZARD CLASS	SUB HAZARD CLASS	PG I II	LAND DISPOSAL RESTRICTION I RCRA SUB- WASTE CATEGOR' GODE CODE	F-SOLVENT	ww	ROUTE
1 DIISOPROPYLAMINE 2-3% ETHYLBENZENE 12-13% HEPTANE 34-35% LITHIUM DIISOPROPYLAMIDE 26-27%	L	1 X 5L	4.3	3	1	D001, D003 6, D	249	NWW	WTI REPAR
TETRAHYDROFURAN 23%	·								



Land Disposal Restriction Notification Form

Page: 1 of 3

Printed Date :Feb 16, 2012 MANIFEST INFORMATION Manifest Tracking Info. Generator: Norquay Technology Inc 800 West Front Street 005239281FLE Address: Chester, PA 19013 EPA ID#: PAD982363889 Sales Order No: 734137676 LINE ITEM INFORMATION Line Item: Page No: LDR Disposal Category Profile No: Treatability Group: **7**7. NON-WASTEWATER 90573 11 (Labpack Alternate Standard) **EPA Waste Code EPA Waste SubCategory** D001 Ignitables, except High TOC Liquids D003 Water Reactives Applies to Certification Manifest Line Items This labpack is subject to the treatment standards specified in 40 CFR 268 Subpart D. I certify under 1. penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under appendix IV to 40 CFR part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment. Waste analysis data, where available, is attached. Signature: Print Name Title: Date:



Land Disposal Restriction Notification Form

Page 및 of 3

Printed Date :Feb 16, 2012

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### Land Disposal Restriction Notification Form

Page : 3 of 3

Printed Date: Feb 16, 2012 MANIFEST INFORMATION Manifest Tracking Info. Generator: Norquay Technology Inc. 005239281FLE 800 West Front Street Address: Chester.PA 19013 Sales Order No: 734137676 EPA ID#: PAD982363889 LINE ITEM INFORMATION LDR Disposal Category Treatability Group: Line Item: Page No: Profile No: NON-WASTEWATER 11 (Labpack Alternate Standard) 3 LRCTD EPA Waste Code EPA Waste SubCategory D001 Ignitables, except High TOC Liquids D003 Water Reactives Applies to Certification Manifest Line <u>Items</u> This labpack is subject to the treatment standards specified in 40 CFR 268 Subpart D. I certify under 1. penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under appendix IV to 40 CFR part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment. Waste analysis data, where available, is attached. Signature: **Print Name** Title: Date:

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Form Approved, OMB No. 2050-0039

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SC PPW 3/3/2011 734173616 Form Approved. OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) UNIFORM HAZARDOUS 1. Generator ID Number . Manifest Tracking Numb 3. Emergency Response Phone 2. Page 110f 005239344 (800) 483-3718 PAD982363889 WASTE MANIFEST Generator's Site Address (if different than mailing address) Generator's Name and Mailing Address iorguzy Technology Inc O Box 468 800 West Front Street Chester, PA 19013 Chester PA 19013 Generator's Phone: U.S. EPA ID Number 6. Transporter 1 Company Name Clean Harbors Environmental Services Inc MAD039322250 U.S. EPA ID Number 7. Transporter 2 Company Name Environmental Services Inc MAD039322250 U.S. EPA ID Number n Harbors El Dorado LLC ARD069748192 )9 American Cimie Dorado, AR 71730 (870)863-7173 Facility's Phone: 10. Containers 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 11. Total 12. Unit 98. 13. Waste Codes Quantity Wt./Vol. and Packing Group (if any)) No. НМ Type NASO77, HAZARDOUS WASTE, SOLID, N.O.S., (TOLUENE, F005 F003 004 Đ GENERATOR ACETONE), 9, PG III DΜ X *4000* 14. Special Handling Instructions and Additional Information 1.CH423307 ERG#171 4155 NUDED# 12586 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Adamowledgment of Consent. Loertify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name Pinnel Sez1 16. International Shipments Export from U.S. Port of entry/exit: Import to U.S. Date leaving U.S. Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt Materials Transporter 1 Printed/Typed Name Transporter 2 Printed/Typed Name med ¥ 18. Discrepancy 18a. Discrepancy Indication Space Residue Pertial Rejection __ Full Rejection Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Facility's Phone Day 18c. Signature of Alternate Facility (or Generator) Month 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in term 18a d/Typed Name DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED) EPA Form 8700-92 (Rev. 3-05) Previous editions are obsolete.

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9. Hazardous Waste Report Ma	nagement Method Codes (i.e., codes for hazardous waste tr		ecycling systems)						
Link	<b>-</b>	3.			4.				
	Operator: Certification of receipt of hazardous materials cov	ered by the manifest ex	cept as noted in Ite	m 18a					
rinted/Typed Name		Signature					Mo	nth Da	y Year
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orm 8700-22 (Rev. 3-05) P	revious editions are obsolete.	DESIG	NATED FA	CILITY	TO DESTIN	NOTTAK	STATE	(IF RF	HIBET

Form Approved. OMB No. 2050-0039 med for use on elite (12-pitch) typewriter.) 2. Page 1 of 3. Emergency Response Phone Manifest Tracking Numbe Generator iD Number 008543531 336-944-1135 PAD982363889 1 Generator's Site Address (if different than mailing address) e and Mailing Address **DUAY TECHNOLOGIES** BOX 468, CHESTER, PA 19016-0468 800 WEST FRONT ST. enerator's Phone: (610) 874-3573 CHESTER, PA 19013 U.S. EPA ID Number Transporter 1 Company Name STAT INC. NCD980799142 U.S. EPA ID Number 7. Transporter 2 Company Name 8. Designated Facility Name and Site Address U.S. EPA ID Number NCD980642132 ECOFLO, INC. 2750 PATTERSON STREET GREENSBORO, NC 27407 01 336 855-7925 Facility's Phone: 9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 9a 11. Total 12. Unit 13. Waste Codes and Packing Group (if any)) НМ Quantity Wt. Vol. No Type RQ, WASTE, FLAMMABLE LIQUIDS, N.O.S., (ACETONE, XYLENE), 3, EST D001 F003 30,000 GENERATOR FC05 UN1993, II, (D001), ERG#128 1DXH-033 NON-RCRA NON-DOT REGULATED SOLIDS (MT DRUMS) 124 3HAZARdous WASTESOUD NOS 9, NA3077, PETIL (XY lene, Tollege) F03|F05 AG WASTE, FLAMMABLE LIGUIDS CORNOSIVE, H.O. S. (toluenz, hydrochloric actid) DOOL HONG 840 3(8) UN2924 ecial Handling Instructions and Additional Information
) 2ECO-027 2) 2ECO-EMP-WN WO#153324 Corrections approved Ericlogian 2415-11AM GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPAAcknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name International Shipments import to U.S. Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S. 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Day Day 18. Discrepancy 18a. Discrepancy Indication Space Quantity ___ Partial Rejection ☐ Full Rejection Residue Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number 孌 Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Day Year Month 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name A Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

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## ATTACHMENT E INSPECTION RECORDS

### WEEKLY HAZARDOUS WASTE CONTAINERS INSPECTION CHECKLIST

### **REACTOR ROOM** ACCUMULATION POINT

	DATE Jan. 24, 2014			
	INSPECTED BY:		4	
	item	YES	NO	COMMENTS/CORRECTIVE ACTIONS TAKEN
	HAZARDOUS WASTE CONTAINERS			
Α	Are any containers open?			
	Are any containers severely rusted?			
С	Are any containers leaking?			
	if answer to items A, B or C is YES, write comments and corrective action taken			
D	Is accumulation start date marked on containers?			
E	Are containers marked "HAZARDOUS WASTE"?			·
	Are labels readable from the inspection aisle?			
G	Is there sufficient area to walk around and inspect all drums?			
	if answer to items D, E, F, or G is NO, write comments and corrective action taken			
	ACCUMULATION POINT			
Н	Are all hazardous waste containers on a containment pallet?			
1	Is adequate aisle space present to allow unobstructed movement for emergency response?			
	if answer to items H or I is NO, write comments and corrective action taken			
	EMERGENCY RESPONSE			
J	is an empty salvage drum nearby?			·
K	is spill absorbent material nearby?			·
L	is a fire extinguisher readily accessible?	/		
М	is the fire extinguisher fully charged?			
N	is the fire extinguisher seal in tact?			
	if answer to items J, K, L, M or N is NO, write comments and corrective action taken			



## ATTACHMENT F AEROSOL CAN DISPOSAL MEMO



### Norquay Technology Inc. USA P. O. Box 468, Chester, PA. 19016-0468

610-874-4330(P) 610-874-3575(F) www.norquaytech.com

Email: jhogate@norquaytech.com

August 2nd, 2013

SUBJECT: Aerosol Can Disposal

Attention Norquay Employees!

On July 30th, 2013 we had an inspection from the EPA. One of the topics that came out of this inspection was the disposal of aerosol cans such as; spray paint, spray adhesive, etc.

#### As of today all aerosol cans must be disposed of in hazardous solid waste drums.

Hazardous solid waste drums are located throughout the facility. There is the one in the reactor room next to the cobra pump, one is located out by the glycol chiller tank, and the remaining drums are located in the back of the warehouse.

Lastly, please make sure that once you have disposed of the aerosol can that you put the lid back onto hazardous solid drum.

Please sign the following sheet saying you understand the contents of this memo.

Thank you,

Jim Hogate

Engineering

Aerosol Can Disposal	Memo Signature Sheet – August 2 nd , 2	2013
Print Name	Signature	Date
BOB MILLER	131 469a	8-2-13
Mike Allen	Mike alle	8-2-13
TIMOMIY TODO	Grantony well	21-5-8
MOSES KALLON	FEC.	8-2-13
Jose Herranio	Adrilla-12	8-2-13
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Konjo Fefegula	Kufefegula	8/5/13
Seen Philsett	Milita	7/5/13
Il one	Gll four	8/5/13
Lynn Bayron	2,00	\$/5/13
KARIE N. DAVIS	Th. 11/ Gas	8-5-13
Markese Clay	Markese Cla	8-5-13
Killing + Hillmonth	Marine O	3/5/13
GEORCE DENNI H	Lug vole H	96/6/13



# ATTACHMENT G REVISED TRAINING RECORDS AND TRAINING MATRIX

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Торіс	Lynn Bauman - Plant operator (Terminated)	Kylief Barfield - Plant operator (Terminated)
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Quality Manual		
Quality Manual Rev. 0 Nov. 1, 2013		
Quality System Processes (QSP's)		
QSP-4.2.3 Control of Documents Rev. 0		
QSP-4.2.4 Control of Records Rev. 0		
QSP-6.2.2 Training Rev. 0		
QSP-7.3.1 Design & Development Rev. 0		
QSP-7.4 Purchasing Rev. 0		
QSP-8.2.2 Internal Audits Rev. 0		
QSP-8.3 Control of Nonconforming Product Rev. 0		
QSP-8.5.2 CA/PA		
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	10/23/12	
	12/21/12	
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Торіс	Lynn Bauman - Plant operator (Terminated)
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DOT Shipping Refresher Due	
Fork Lift - As Needed	
Pire Extinguisher	
Emergency Response	
Hearing Conservation/Heat Stress	
Tazardous Waste Management	
Hazardous Waste Management ook Out/ Tag Out	
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Hazardous Waste Management ook Out/ Tag Out	

Kylief Barfield -Plant operator (Terminated)

Торіс	
Safety Committee Training	
Note: Green Color Designates Training Required	
Date: Indicates Date Training Conducted	
Rev 1	1
Last Updated 4/1/2014	1

Lynn Bauman -Plant operator (Terminated) Kylief Barfield -Plant operator (Terminated)



### ATTACHMENT H

LDR Forms

Spent Non-Halogenated Solvents

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Clean Harbors Environmental Services Inc			3932225	0	
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35. Hazardo:s Waste Report Nanagement Method Codes (i.e., codes for hazardous waste treatment, disposal, and	recycling systems)				

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Title:

#### Land Disposal Restriction Notification Form

Page: 1 of 1

Printed Date: Sep 25, 2013 MANIFEST INFORMATION Generator: Norquay Technology Inc Manifest Tracking Info. 800 West Front Street 006798288FLE Address: Chester,PA 19013 EPA ID #: PAD 982363889 Sales Order No: 738023562 LINE ITEM INFORMATION Line Item: Page No: Profile No: Treatability Group: LDR Disposal Category 1. CH419477 NON-WASTEWATER 2 (This is subject to LDR.) EPA Waste SubCategory EPA Waste Code Carbon Disulfide, Cyclohexanone, and/or methanol F003 mixtures only
Carbon Disulfide, Cyclohexanone, and/or methanol F005 LDR Chemical Data Underlying Contaminants Constituents Subject to Hazardous of Concem Treatment Constituents Chemical Ÿ ACETONE N Y **METHANOL** Υ Υ Ν N TOLUENE Applies to Certification Manifest Line Items Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268. Waste analysis data, where available, is attached. Signature: Print Name

Date:



#### ATTACHMENT I

Other LDR Forms



Page: 1 of 5

Printed Date :Jan 10, 2014

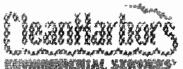
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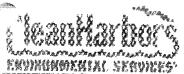
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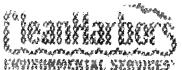
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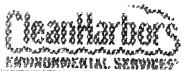
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Printed Date : Jan 10, 2014

Certification	Applies to Manifest Line Items
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.	1 4. 20, 22.
This waste is not restricted as specified in 40 CFR 268 Subpart D.	16. 17 18. 19 21. 23
This labpack is subject to the treatment standards specified in 40 CFR 268 Subpart D. I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under appendix IV to 40 CFR part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for ab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.	2 3. 5 6. 7. 8. 9 10. 11. 12. 13. 14 15.
Waste analysis data, where available, is attached.	ne en gradia en commune que proporto, como como en como en especiales enpresentante en como constante.
Signature . Print Name  Date . Date .	